

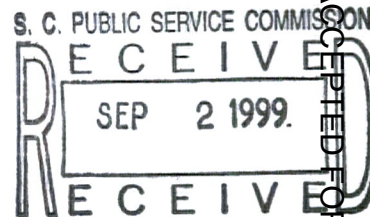
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September 2, 1999

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VIA HAND DELIVERY

The Honorable Gary E. Walsh
Executive Director
South Carolina Public Service Commission
101 Executive Center Dr.
Columbia, SC 29211



RE: United Telephone Company of the Carolinas v. BellSouth
Telecommunications, Inc.

Dear Mr. Walsh:

Enclosed are the original and ten (10) copies of a Complaint and Petition for Declaratory Order hereby filed by United Telephone Company of the Carolinas against BellSouth Telecommunications, Inc. Also enclosed is an extra copy that I would appreciate you file stamping and returning same to us via our courier.

If there are any questions or if additional information is needed, please advise.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.

Mitchell Willoughby
Mitchell Willoughby

MW/cc

enclosures

cc: Robert C. Voigt, Esquire
Mr. C. Steve Parrott
Mr. Marty Bocock

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BEFORE

**THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 1999-377-C

POSTED
MR/9-4-99

S. C. PUBLIC SERVICE COMMISSION
RECEIVE
SEP 2 1999
RECEIVE

**UNITED TELEPHONE COMPANY OF THE
CAROLINAS,**

COMPLAINANT

-v-

BELLSOUTH TELECOMMUNICATIONS, INC.,

RESPONDENT

S. C. PUBLIC SERVICE COMMISSION
RECEIVE
SEP 13 1999
RECEIVE
UTILITIES DEPARTMENT

**COMPLAINT AND PETITION FOR DECLARATORY
ORDER**

**Mitchell Willoughby, Esquire
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Wake Forest, North Carolina 27587-5900
Telephone : 919-554-7870
FAX: 919-554-7913
North Carolina State Bar No. 6898**

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. _____

**UNITED TELEPHONE COMPANY OF THE
CAROLINAS,**

COMPLAINANT

-v-

BELLSOUTH TELECOMMUNICATIONS, INC.,

RESPONDENT

**COMPLAINT AND PETITION FOR DECLARATORY
ORDER**

Pursuant to S. C. Code Regs. RR.103-835 and 103-836 (1976),
United Telephone Company of the Carolinas ("United", or the
"Complainant"), hereby submits the within Complaint and Petition for
Declaratory Order against BellSouth Telecommunications, Inc.
("BellSouth", or the "Respondent"). In support of this Complaint and
Petition, United states the following:

PART ONE: PARTIES TO THIS COMPLAINT

- 1. Complainant United is a South Carolina corporation, and holds a Certificate of Public Convenience and Necessity from the South Carolina Public Service Commission authorizing it to provide telecommunications services in South Carolina. The address for United's Administrative Headquarters is: 14111 Capital Boulevard, Wake Forest, North Carolina 27587-5900. United also maintains an office in Columbia, South Carolina at 1122 Lady Street, Suite 1050, Columbia, South Carolina 29201, Telephone: 803-252-4505, FAX: 803-252-6751.**
- 2. Respondent BellSouth is a Georgia corporation licensed to do business in South Carolina. Respondent BellSouth holds a Certificate of Public Convenience and Necessity from the South Carolina Public Service Commission authorizing it to provide telecommunications services in South Carolina. Respondent BellSouth maintains an office in Columbia, South Carolina: BellSouth Telecommunications, Inc., Suite 807, 1600 Hampton Street, Columbia, South Carolina 29201, Telephone: 803-733-6300, FAX: 803-771-4680.**

PART TWO: COMPLAINANT'S LEGAL REPRESENTATIVES

3. In accordance with S. C. Code Regs. R. 103-804S. (1) (b), the Complainant United is represented by Counsel in this proceeding:

Local Counsel Authorized to Practice in South Carolina:

**Mitchell Willoughby, Esquire
John M. S. Hoefer, Esquire
Willoughby & Hoefer, P.A.
1022 Calhoun Street, Suite 302
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Out-of-State Counsel:

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Wake Forest, North Carolina 27587-5900
Telephone: 919-554-7870
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North Carolina State Bar No. 6898**

PART THREE: JURISDICTION OF THE COMMISSION

4. Both of the parties to this Complaint are engaged in providing telecommunications services to the public in South Carolina, and are subject to the regulatory jurisdiction of the South Carolina Public Service Commission.

5. The right of the Complainant to file this Complaint, and the authority of the Commission to hear and resolve this Complaint, are conferred, inter alia, under S. C. Code Ann. §§58-3-140 (1998 Cum. Supp.), 58-9-390 (1976), and 58-9-1080 (1976); S. C. Code Regs. RR. 103-835 and 103-836 (1976), and other applicable provisions of law and the Commission's regulations and rules.

PART FOUR: FACTUAL ALLEGATIONS

6. In anticipation of the need for intraLATA toll depooling and the implications of intraLATA competition, representatives of the Local Exchange Carriers ("LEC's") participating in the intraLATA toll pool began meeting in 1992 to develop an equitable means for depooling in a competitive environment. As a result of these efforts, the initial toll providers in South Carolina developed the South Carolina Depooling Guidelines ("Guidelines"). (See ATTACHMENT A hereto which is incorporated herein by reference.) The initial toll providers include the parties to this Complaint: BellSouth Telecommunications, Inc.* and United Telephone Company of the Carolinas, as well as GTE South. The Depooling Guidelines were executed, with the last signatory executing the document on or about June 21, 1993.

* BellSouth Telecommunications, Inc. is sometimes referred to as "Southern Bell", "Bell", or "BellSouth" in the various Attachments to this Complaint. The terms are used interchangeably within this Complaint and in the Attachments.

7. On November 2, 1992, the South Carolina Public Service Commission issued Order No. 92-919 (Order Setting Up Task Force For 10XXX IntraLATA Competition Issues) in combined Docket Nos. 92-182-C, 92-183-C, and 92-200-C. (See ATTACHMENT B hereto which is incorporated herein by reference.) The Order provided for the creation of an Industry Task Force to address the various issues raised by 10XXX IntraLATA Competition:

Based upon Sprint's and AT&T's request for unblocking of 10XXX on an intraLATA basis, the IXC's assertion that local basic service rates should not be impacted as a result of any unblocking of 10XXX, the agreement of the IXC's and the LEC's that a task force should be implemented, the agreement of the LEC's that they were not opposed to 10XXX intraLATA competition, and the fact that stipulations have been reached in other jurisdictions concerning these issues by industry task force, the Commission has determined that an industry task force should be set up to address the issues herein. The task force shall be headed up by the Commission Staff, and the task force shall have no more than six (6) months from the date of this order to make a recommendation to the Commission concerning the resolution of the issues of the implementation of 10XXX intraLATA competition. The task force shall include all LEC's and all facility based IXC's, as well as the parties to this Docket, including the Consumer Advocate and DIRM. (Conclusion of Law No. 1, Page 6; Order No. 92-919; November 2, 1992.)

8. Depooling of the IntraLATA Toll Pool was one of the issues specifically cited by the Commission for study by the Industry

Task Force. (Conclusion of Law No. 2, Page 6; Order No. 92-919; November 2, 1992.)

- 9. On June 3, 1993, the South Carolina Public Service Commission issued Order No. 93-462 (Order Approving Stipulation and Agreement) in combined Docket Nos. 92-182-C, 92-183-C, and 92-200-C. (See ATTACHMENT C hereto which is incorporated herein by reference.) The Commission's June 3, 1993 Order commented favorably on the work of the Industry Task Force, and specifically adopted and approved the South Carolina IntraLATA Depooling Plan ("Plan"), a document stipulated to by the Industry Task Force on May 10, 1993.**
- 10. The South Carolina IntraLATA Depooling Plan stipulated to by the Industry Task Force and adopted and approved by the Commission under Order No. 93-462 states the following:**

The Purpose of the Plan is to set forth the general principles by which participating local exchange carriers ("LECS") in South Carolina will eliminate the current intraLATA toll pooling arrangement (the "intraLATA toll pool") and be compensated for intraLATA traffic in a limited competitive environment if so ordered by the Commission. (Introduction to the Plan; emphasis added.)

Southern Bell, General Telephone (GTE) and United will act as toll providers and as such will establish toll rates and be responsible for compensating one another for all intraLATA traffic terminated in their respective areas. (Enumerated Paragraph 2 of the Plan; emphasis added.)

11. Consistent with the mandate given to the toll providers under Paragraph 2 of the Depooling Plan to compensate one another for all intraLATA traffic terminated in their respective areas, Section 13 of the Depooling Guidelines provides for compensation for the termination of interexchange (inter-toll provider) Area Calling Plan (ACP) traffic. The specific commitments of the parties to the Depooling Guidelines with respect to compensation for terminating traffic are set forth in Subparagraphs a., b., c., and d. of Section 13 of the Depooling Guidelines. The complete text of Section 13 is set forth below:

13. If the initial toll providers implement area calling (ACP) type plans wherein measured intercity calling is established under a company's local tariffs then the local calling plan traffic will not be subject to the toll traffic guidelines. It is agreed that if an ACP type plan is implemented, the following guidelines will apply:

- Bell will continue to act as a centralized administrator for the ACP settlements and the initial toll providers agree to submit usage records in order that Bell can carry out the administration functions.
- The initial toll providers agree that the terminating ACP traffic will still be subject to company specific access charges.
- The initial toll providers agree that the compensation for CCL on ACP type traffic is complex, and in order to achieve equity between the Companys, the "To and From" locations involved in the ACP must be reviewed in order to determine not only the amount but whether CCL compensation is appropriate. The initial toll providers agree

that the following ACP CCL compensation guidelines are equitable:

- a. If only one of the toll providers offers an Area Calling Plan (ACP) and the "To" locations terminate on a different toll provider, it is agreed that the company that implements the ACP plan will pay the terminating toll provider for terminating ACP service based on the terminating company's switched access traffic sensitive rates.
- b. Additionally, the toll provider which offers the ACP plan agrees to provide a "floor level" of terminating CCL access revenues, applicable to ACP traffic originated in their exchanges, to the terminating toll provider for the term of this Agreement. The "floor level" is defined as the level of intrastate intraLATA CCL revenue from the base period calculations.
- c. If two toll providers offer an ACP type plan and the "From and To" locations both carry local traffic (the ACP traffic is bi-directional), then CCL compensation is not due either company for the ACP traffic. CCL compensation will still be due for remaining toll traffic on the From and To locations.
- d. If ACP traffic is offered on a flat rate two way basis (flat rate EAS), then a usage settlement will not be made.

- 12. United implemented its Area Calling Plan (marketed under the name "RegionCall") on or about October 1, 1996. BellSouth had previously implemented its ACP Plan (marketed under the name

"Area Plus") in 1994. Upon implementation of both of these ACP plans, which contain flat-rated customer billing options, some interexchange routes between BellSouth and United provided ACP calling in both directions (two-way), while other routes provided ACP calling in only one direction and intraLATA toll calling in the other direction (one-way).

13. The Depooling Guidelines adopted by the initial toll providers (United, GTE South and BellSouth) eliminate a usage settlement between the affected toll providers for flat-rated ACP traffic only when "ACP traffic is offered on a flat rate two-way basis (flat rate EAS)" (See ATTACHMENT A, Paragraph 13. d., emphasis added.) Thus, the Guidelines provide for a "two-way" traffic test, based upon a review of the "from and to" locations (exchanges) of the respective companies, to determine if compensation is due. Under the test, if the "from and to" locations (exchanges) of the respective toll providers each offer customers a flat-rated ACP option for calling between the two locations, the traffic is deemed "two-way" and no usage settlement applies. Notwithstanding the plain meaning of the Guidelines in this regard, BellSouth has asserted that the "two-way" traffic test should be based upon the date a "company" implements an Area Calling Plan in any location within the company's service territory within the state of South Carolina, irrespective of whether

the "from and to" locations for a particular interexchange route offer a bi-directional flat-rated ACP calling option for calling between the two locations. In addition to being contrary to the plain language of the Guidelines, such an interpretation results in an inequitable treatment for United and contravenes the Commission approved Depooling Plan which provides that the initial toll providers (including United) will be responsible for compensating one another for the termination of intraLATA traffic. To illustrate the inequity of the BellSouth interpretation of the Guidelines, when a United customer in Greenwood calls a BellSouth customer in Greenville, United pays BellSouth full switched access charges (Carrier Common Line and traffic sensitive) for the termination of this intraLATA toll call. On the other hand, when that same BellSouth customer in Greenville subscribes to BellSouth's flat-rated ACP plan and calls the same United customer in Greenwood, BellSouth has refused to compensate United in any way for the termination of the call. BellSouth has refused to pay any usage settlement to United for the termination of the type of traffic described in the aforementioned Greenville to Greenwood scenario (which is clearly "one-way" flat-rated ACP traffic) based upon BellSouth's interpretation that settlements should be accomplished on a "company" basis and the fact that United is offering flat-rated ACP traffic on at least one route within its entire service territory. At such time as Greenwood

customers are offered a flat-rated ACP plan to originate calls to BellSouth's Greenville exchange, United would agree with BellSouth that no usage settlement is due either company for flat-rated ACP calling on this route, because this would constitute a "two-way" arrangement under the terms of the Depooling Guidelines (See ATTACHMENT A, Paragraph 13. d.). Moreover, BellSouth's interpretation of the Depooling Guidelines simply ignores the fact that currently calling from Greenwood to Greenville is considered intraLATA toll for settlement purposes.

14. To illustrate the magnitude of this issue for United, based upon interexchange traffic data taken from route samples during 1998, United received no compensation from BellSouth for almost 44% of the total traffic (ACP and toll) originated by BellSouth and terminated by United. (See ATTACHMENT D attached hereto and incorporated herein by reference.) The traffic study also shows that, exclusive of Extended Area Service arrangements, approximately two-thirds (66%) of all BellSouth interexchange customer traffic terminated by United is flat-rated ACP while only one-sixth (17%) of United's customer traffic to BellSouth is flat-rated ACP. BellSouth's interpretation of the Depooling Guidelines (related to compensation to other toll providers for terminating ACP traffic) is consistent with and reinforces BellSouth's aggressive retail marketing strategy for

the proliferation of flat-rated ACP Plans, and results in a significant financial (earnings) advantage to BellSouth, at the expense of United.

15. Complainant United has rendered bills to BellSouth seeking compensation for one-way flat rated ACP terminating traffic in accordance with Section 13. a. of the Depooling Guidelines, and in accordance with enumerated Paragraph 2 of the South Carolina IntraLATA Depooling Plan adopted and approved by the Commission under Order No. 93-462. A set of all such bills rendered to date is attached. (See ATTACHMENT E attached hereto and incorporated herein by reference.) To date, BellSouth has refused to pay all such bills.
16. United has requested that, as the central administrator for the ACP settlements process, BellSouth provide it with the historical information from the 1992 base period necessary to calculate the appropriate Carrier Common Line (CCL) compensation due United in accordance with 13. b. of the Guidelines. Upon receipt of this information, United will issue a bill to BellSouth for the appropriate CCL charges associated with the one-way flat rated ACP traffic terminated by United.

17. Despite BellSouth's refusal to compensate United for one-way flat-rated ACP terminating traffic in accordance with Section 13 of the Depooling Guidelines, United has continued in good faith to engineer, procure, install, and maintain facilities for terminating BellSouth's one-way flat rate ACP traffic in accordance with the Depooling Guidelines. BellSouth's actions in failing and refusing to compensate United violates Commission Order No. 93-462, is inequitable, results in BellSouth being unjustly enriched, converts to the benefit and use of BellSouth compensation that belongs to United, and causes United to maintain facilities at its expense that are used by BellSouth without the payment of due compensation.
18. The total amount of compensation due United from BellSouth for the period October 1, 1996 through June 30, 1999 in accordance with the Depooling Guidelines and the South Carolina IntraLATA Depooling Plan is approximately One Million Dollars (\$1,000,000.00) for the traffic sensitive rate elements. As stated in Paragraph 16, above, United has requested historical data from BellSouth relating to Carrier Common Line (CCL) element compensation. If necessary, United will seek to acquire this information from BellSouth through discovery in this proceeding, and will present evidence at hearing to establish the amount of CCL compensation due United.

REQUEST FOR RELIEF

Therefore, Complainant United respectfully requests and prays that the Commission issue an Order:

- (1) declaring that United is entitled to compensation from BellSouth under the Depooling Plan and Depooling Guidelines for the termination of BellSouth's one-way ACP intraLATA traffic;**
- (2) directing BellSouth to compensate United for traffic sensitive access charges for all one-way flat rated ACP traffic terminated on United's network from October 1, 1996 through the date of this Complaint;**
- (3) directing BellSouth to compensate United for Carrier Common Line charges for all one-way flat rated ACP traffic terminated on United's network from October 1, 1996 through the date of this Complaint;**
- (4) directing BellSouth to compensate United prospectively from the date of this Complaint for traffic sensitive access charges for all one-way flat rated ACP traffic terminated on United's network until such time as new interexchange settlement agreements may be adopted by the parties to this Complaint;**

- (5) directing BellSouth to compensate United prospectively from the date of this Complaint for Carrier Common Line charges for all one-way flat rated ACP traffic terminated on United's network until such time as new interexchange settlement agreements may be adopted by the parties to this Complaint;
- (6) awarding such other and further relief in favor of United as the Commission deems just and proper.

Respectfully submitted, this 2nd day of September, 1999.

Counsel for Complainant, United
Telephone Company of the Carolinas

Mitchell Willoughby

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John M. S. Hoefer, Esquire
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-- and --

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ATTACHMENTS

ATTACHMENT A: South Carolina Depooling Guidelines.

ATTACHMENT B: Order No. 92-919; Docket Nos. 92-182-C, 92-183-C, and 92-200-C (November 2, 1992).

ATTACHMENT C: Order No. 93-462; Docket Nos. 92-182-C, 92-183-C, and 92-200-C (June 3, 1993).

ATTACHMENT D: Exhibit Detailing Distribution of Traffic.

ATTACHMENT E: Bills Rendered by Complainant United to BellSouth.

ATTACHMENT A

South Carolina Depooling Guidelines

(9 Pages)

SOUTH CAROLINA DEPOOLING GUIDELINES

The objective of this agreement is to set forth the guidelines under which the initial toll providers agree to compensate one another for interexchanged intraLATA traffic in a post Division of Revenue (DR) pool environment. The initial toll providers referenced in these guidelines refer only to GTE South Incorporated, Contel of South Carolina Inc., (hereinafter collectively referred to as GTE), Bell South Telecommunications Incorporated, (hereinafter referred to as Bell or Southern Bell) and United Telephone Company of the Carolinas, Inc. (hereinafter referred to as United). If a company other than Bell, United or GTE becomes a toll provider, they will be referred to as "other or non-initial toll providers."

The guidelines contained within this agreement are intended to be consistent with the limited intraLATA competition as contemplated by the South Carolina Public Service Commission in the Order in combined Docket Nos. 92-182-C, 92-183-C, and 92-200-C. The intrastate products defined within this agreement are those intraLATA products normally defined as toll (i.e. MTS, WATS, 800, Private Line) or that traffic which is currently defined as intraLATA toll which may in the future be converted to a local measured basis.

GTE, Bell and United agree that the following guidelines will be used by the initial toll providers when establishing the mechanism to exit the DR pool:

1. If GTE incurs a revenue loss due to depooling, then Bell and United agree that the initial revenue loss should not be immediately borne by GTE or its ratepayers. The revenue loss, calculated using 1992 as a base period, will be transitioned over a four year period beginning at the date of depooling. During the first year after depooling, GTE will receive from Bell and United 80% of the initial revenue loss, 60% in the second year, 40% in the third year, and 20% in the fourth year. After the fourth year, GTE will not receive a transition payment from the other two initial toll providers. The formula for the transition calculation is delineated in Attachment I to these guidelines.
2. GTE, Southern Bell, and United when acting as the initial toll providers will establish toll rates for their subscribers and will be responsible for

compensating each other as described herein. Southern Bell agrees that as the date of depooling, that GTE and United are entitled to file a copy of the then existing Bell intraLATA tariffs as their company specific intraLATA tariffs. United and GTE will be able to establish and use the same rates and structures for Message, OutWATS, InWATS, Operator, and Private Line type products until such time as the companies desire to establish different rates and structures.

3. The non-initial toll providing local exchange carriers (LECS) operating within South Carolina have the option to become toll providers also. The LECs that become toll providers shall operate under the same guidelines as delineated herein, except that only Bell and United will be responsible for paying GTE a transition amount.
4. GTE, Bell and United anticipate that the other non-toll providers (access providers) will initially use Southern Bell as their toll provider. The three initial toll providers agree that an access provider may become an access provider of a toll provider other than Southern Bell if the other toll provider agrees to such an arrangement. Should an access provider choose a non-Bell toll provider, the access provider must use the toll rates established by that toll provider.
5. The access rates that the toll providers use for compensating one another shall be consistent with their specific interLATA access rates except as provided in paragraph 6 (six) following.
6. GTE has established a flat rate per line structure and rate for Carrier Common Line (CCL) compensation from the interexchange carriers, and the carriers are billed based upon relative market share. The flat rate CCL structure will continue after depooling; however, the rate must be adjusted to reflect the changing market share calculation. GTE shall price the CCL recognizing both the applicable interLATA and intraLATA units. Attachment II to these guidelines will be the formula used by GTE to calculate the new CCL rate.
7. Southern Bell agrees to act as a central administrator for the compensation process used by GTE, Bell and United. The initial toll providers agree to submit usage records to Bell in order that Bell may administer the centralized system for both the toll providers and the access providers within the state.
8. The initial toll providers agree to compensate one another based upon an Originating Responsibility Plan

(ORP) basis. Under the ORP basis the toll providers will retain the end user billing amounts earned (i.e. Sent Paid and Sent Collect revenue) by their respective company and pay the toll provider that terminates the service access charges including CCL. Compensation for private line services will be based upon a multi-company, multi-bill arrangement for end user billing.

9. The initial toll providers may continue to provide operator services for themselves or the access providers, and the compensation for operator services will be covered under a separate contract. Any GTE revenue change as a result of the changes to operator contracts will be included in the transition calculation. The transition calculation will recognize the Horry Cooperative DA take-back when it occurs.
10. The initial toll providers agree that the billing and collection rates that may be charged to each other in order to pass earned revenue (i.e. sent collect) will not exceed Commission authorized rates.
11. The toll providers agree that until the advent of presubscribed 1+, 0+ and 0- competition, that the toll providers will not bypass one another in order to reach one another's end users.
12. The initial toll providers agree that with the exit from the DR pool, each company's specific revenue streams are important; therefore, the toll providers agree to implement mechanisms within 6 (six) months of depooling to compensate one another for miscellaneous revenue streams such as cellular traffic, local credit card calling, etc.
13. If the initial toll providers implement area calling (ACP) type plans wherein measured intercity calling is established under a company's local tariffs then the local calling plan traffic will not be subject to the toll traffic guidelines. It is agreed that if an ACP type plan is implemented, the following guidelines will apply:
 - Bell will continue to act as a centralized administrator for the ACP settlements and the initial toll providers agree to submit usage records in order that Bell can carry out the administration functions.
 - The initial toll providers agree that the terminating ACP traffic will still be subject to company specific access charges.

- The initial toll providers agree that the compensation for CCL on ACP type traffic is complex, and in order to achieve equity between the Companies, the "To and From" locations involved in the ACP must be reviewed in order to determine not only the amount but whether CCL compensation is appropriate. The initial toll providers agree that the following ACP CCL compensation guidelines are equitable:
 - a. If only one of the toll providers offers an Area Calling Plan (ACP) and the "To" locations terminate on a different toll provider, it is agreed that the company that implements the ACP plan will pay the terminating toll provider for terminating ACP service based on the terminating company's switched access traffic sensitive rates.
 - b. Additionally, the toll provider which offers the ACP plan agrees to provide a "floor level" of terminating CCL access revenues, applicable to ACP traffic originated in their exchanges, to the terminating toll provider for the term of this Agreement. The "floor level" is defined as the level of intrastate intraLATA CCL revenue from the base period calculations.
 - c. If two toll providers offer an ACP type plan and the "From and To" locations both carry local traffic (the ACP traffic is bi-directional), then CCL compensation is not due either company for the ACP traffic. CCL compensation will still be due for remaining toll traffic on the From and To locations.
 - d. If ACP traffic is offered on a flat rate two way basis (flat rate EAS), then a usage settlement will not be made.
- 14. The toll providers agree that terminating compensation paid to one another should be based upon actual usage, except as may be modified for ACP traffic. The actual terminating usage will be calculated via records submitted to the administrator by each LEC in South Carolina.
- 15. If 1+, 0+ and 0- presubscribed intraLATA competition is implemented, the agreement is terminated. However, with mutual consent, certain of the procedures and guidelines contained herein may be continued.

16. The toll providers agree to compensate one another at the rate of \$.004 per minute for the use of tandem to tandem facilities. This compensation shall be referred to as network compensation.

CONCURRENCE:

Bell South Telecommunications, Inc.

James B. Wright
United Telephone Company of the
Carolinas, Inc.


Norman L. Lerner
GTE South Incorporated/Contel of
South Carolina, Inc.

16. The toll providers agree to compensate one another at the rate of \$.004 per minute for the use of tandem to tandem facilities. This compensation shall be referred to as network compensation.

CONCURRENCE:


Bell South Telecommunications, Inc.

United Telephone Company of the
Carolinas, Inc.


GTE South Incorporated/Contel of
South Carolina, Inc.

Attachment I

DEPOOLING TRANSITION
FOR GTE

This attachment defines the formula for developing the transition amount for GTE South and Contel of South Carolina relative to exiting the Division of Revenue pool and beginning an originating responsibility plan basis for intraLATA settlements. The formula will be applied separately for GTE and Contel. The parties agree that the formula for calculating the transition amount is as follows:

1. 1992 intraLATA revenue requirement (incl secondary DA)
- LESS:
2. End User Earned Revenues
3. Access revenues due GTE for terminating traffic from other toll providers (incl CCL, TS, B&C)
4. Operator services revenues
5. Network revenues
- PLUS:
6. Access costs due other toll providers for terminating traffic from GTE (incl CCL, TS, B&C)
7. Operator services costs
8. Network costs
- EQUALS:
9. Revenue shortfall
- MULTIPLY:
10. Transition factor

<u>Yr. 1</u>	<u>Yr. 2</u>	<u>Yr. 3</u>	<u>Yr. 4</u>
80%	60%	40%	20%
- EQUALS:
11. Transition amount

Attachment II

DEVELOPMENT OF CCL RATE FOR GTE

The formula for the development of the CCL rate for GTE shall be as defined in this attachment. The formula shall be calculated separately for GTE South Incorporated, and Contel of South Carolina Inc., as long as separate tariffs are maintained for these companies. The formula that each company shall use is as follows:

1. 1992 intraLATA access revenues (calculated by multiplying the base year demands by the 12/31/92 intrastate interLATA access rates)
PLUS:
2. 1992 interLATA access revenues (includes CCL, TS, SpAcc, and billing and collection)
EQUALS:
3. Base period revenues
4. 1992 interLATA TS, B&C, and SpAcc units times 1/1/93 tariffed rates
PLUS:
5. 1992 intraLATA TS units times 1/1/93 tariffed rates
EQUALS:
6. 1992 revenues except CCL revenues
7. Line 3 less line 7 EQUALS base period CCL
8. 1992 average FCC reported switched access lines
9. Line 8 divided by line 9 EQUALS CCL monthly rate/line

The monthly CCL rate per line shall be billed to the Interexchange Carriers (IXCs) and toll providers based upon market share. The market share shall be calculated as follows:

GTE to IXC originated access minutes
PLUS:
IXC to GTE terminated access minutes
PLUS:
Toll provider to GTE terminated access minutes
PLUS:
GTE to toll provider originated minutes
PLUS:
GTE originated to GTE minutes
PLUS:
GTE terminated from GTE minutes

EQUALS:
Total Market

Each Company (excluding GTE since GTE would not bill itself) would then be billed CCL based upon their portion of the total market minutes. For example, if toll provider terminated to GTE is 10% of the market share, then the toll provider would be billed: 10% times lines, times CCL.rate per line.

ATTACHMENT B

**Order No. 92-919; Docket Nos. 92-182-C,
and 92-200-C (November 2, 1992)**

(9 Pages)

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NOS. 92-182-C, 92-183-C & 92-200-C - ORDER NO. 92-919

NOVEMBER 2, 1992

IN RE: DOCKET NO. 92-182-C)	
Application of MCI Telecommunications)	
Corporation for Authority to Provide)	
IntraLATA Telecommunications Services)	
in the State of South Carolina.)	ORDER
)	SETTING UP
DOCKET NO. 92-183-C)	TASK FORCE
Application of Sprint Communications)	FOR 10XXX
Company LP for Authority to Provide)	INTRALATA
IntraLATA Facilities Based Tele-)	COMPETITION
communications Services in the State)	ISSUES
of South Carolina.)	
)	
DOCKET NO. 92-200-C)	
Application of AT&T Communications)	
for Authority to Provide IntraLATA)	
Telecommunications Services in)	
South Carolina.)	

This matter comes before the Public Service Commission of South Carolina (the Commission) by way of separate Applications filed on behalf of MCI Telecommunications Corporation (MCI), Sprint Communications Company L.P. (Sprint), and AT&T Communications of the Southern States, Inc. (AT&T) requesting amendment of their Certificates of Public Convenience and Necessity to allow for the provision of intraLATA services and seeking other related relief from the Commission. The Applications were filed on March 25, 1992, March 26, 1992, and April 3, 1992, respectively. On June 22,

1992, the Commission issued Order No. 92-480 in the instant Docket wherein the Commission determined that these Applications should be combined for hearing purposes.

The Applications were duly noticed to the public and Petitions to Intervene in the established Dockets were filed on behalf of GTE South, Inc. and Contel of South Carolina, Inc. (GTE and Contel), Steven W. Hamm, Consumer Advocate for the State of South Carolina (the Consumer Advocate), Southern Bell Telephone and Telegraph Company (Southern Bell), LDDS of Carolina, Inc. (LDDS), and South Carolina Budget and Control Board, Division of Information Resource Management (DIRM). AT&T, Sprint, and MCI each intervened in the other Dockets of the other interexchange carriers. United Telephone Company of the Carolinas (United) and South Carolina Telephone Coalition (the Coalition or SCTC) were granted their separate Petitions to Intervene Out of Time.

Thereafter, a public hearing was held in the Commission's Hearing Room as scheduled on September 23, 1992, commencing at 10:30 a.m., the Honorable Henry G. Yonce, presiding. D. Christian Goodall, Esquire, and Martha P. McMillin, Esquire, represented MCI; Darra W. Cothran, Esquire, and Chanthina R. Bryant, Esquire, represented Sprint; Francis P. Mood, Esquire, and Roger A. Briney, Esquire, represented AT&T; Elliott F. Elam, Jr., Esquire, represented the Consumer Advocate; Craig K. Davis, Esquire, represented DIRM; M. John Bowen, Jr., Esquire, represented GTE, Contel, and the SCTC; William F. Austin, Esquire, and Harry M. Lightsey, III, Esquire, represented Southern Bell; and Marsha A.

Ward, General Counsel, and Gayle B. Nichols, Staff Attorney, represented the Commission Staff.

Lynn Browning made a statement in support of the Applications on behalf of the South Carolina Telecommunications Managers' Association. MCI presented the direct and rebuttal testimony of Don J. Wood and Elizabeth Dickerson. Mark Sievers gave direct and supplemental testimony on behalf of Sprint. AT&T presented the testimony of Mike Guedel (both direct and rebuttal), Jerri McDonald, JoAnn Zimmerman, and Leo Woodbury. Allen G. Buckalew presented testimony on behalf of the Consumer Advocate. Ted L. Lightle presented testimony on behalf of DIRM. Bruce Schoonover testified on behalf of the Coalition. Duncan M. Fitchet, Jr., testified on behalf of GTE and Contel. Jerry D. Hendrix testified on behalf of Southern Bell.

Based upon the testimony and evidence received during the hearing before the Commission, the Commission makes the following findings of fact:

FINDINGS OF FACT

1. It is the request of the interexchange carriers (IXC's), MCI, Sprint, & AT&T, that the Commission grant the IXC's the ability to provide intraLATA services to their customers and to put in place a regulatory framework that will allow competition to develop within the intraLATA market. MCI's Petition sought this intraLATA service in the form of "1+" authority while Sprint and AT&T sought the granting of intraLATA authority through the unblocking of the 10XXX dialing arrangement.

2. It was the position of all IXC's that the Commission could allow the unblocking of 10XXX without significantly impacting the local exchange companies' (LEC's) local basic service rates. In fact, the IXC's made a commitment that the unblocking of 10XXX for intraLATA competition would not result in an increase in LEC's local basic service rates. MCI proposed a "safety net" plan while the other IXC's stated that they were committed that any lost revenues as a result of intraLATA competition would not come from local basic service rates.

3. It was the position of the LEC's that before the Commission implemented the unblocking of 10XXX, a transition period was necessary so that relevant issues, including the depooling of the intraLATA toll pool, could be addressed by an industry task force. While none of the LEC's opposed 10XXX intraLATA competition, the LEC's recommended that a task force be set up first to address the issues facing the industry with the advent of 10XXX intraLATA competition.

4. The other parties agreed that a task force of some type would be appropriate to address the depooling issue, whether or not access charges should be established on an intraLATA basis to enable the LEC's to not be negatively affected by 10XXX intraLATA competition, and other issues that may affect both the IXC's and the LEC's with the advent of intraLATA competition.

5. In fact, MCI's witness Wood indicated that depooling should be accomplished before 10XXX is unblocked. Mr. Wood indicated that in other jurisdictions, the LEC's, the IXC's and

DOCKET NOS. 92-182-C, 92-183-C & 92-200-C ~ ORDER NO. 92-919
NOVEMBER 2, 1992
PAGE 5

other appropriate parties were able to reach a stipulation which addressed the issues of concern among the industry. These stipulations were filed with the commissions in those jurisdictions for approval and in many instances have been implemented. Mr. Wood indicated that in some jurisdictions it has taken between three to six months, and in some instances longer to accomplish the depooling matter. Mr. Wood indicated that MCI was ready to go forward with the unblocking of 10XXX when the LEC's have resolved the depooling issue. It was GTE's position that the Commission held in abeyance the request for intralATA competition for 24 months in order for the Commission to make findings concerning the pending Extended Area Calling (EAC) Plan filed in Docket No. 92-163-C,¹ as well as address the depooling and transitioning of non-traffic sensitive (NTS) costs.

6. The Consumer Advocate proposed a phased deregulation of the intralATA toll market. Mr. Buckalew recommended price structure regulation in both of the two phases proposed in his testimony in order to assure that entry into the intralATA is not artificially restricted to the dominant incumbent. Mr. Buckalew proposed that it would not be appropriate to require the LEC's to offer 1+ equal access to all carriers at this time. Mr. Buckalew testified that it was important to give consumer choices, and consumers would have a choice by allowing competition in the intralATA market. At the same time, Mr. Buckalew cautioned that

1. On September 28, 1992, the Commission issued Order No. 92-802, which denied the EAC Plan filed by certain LEC's.

competition must be controlled.

7. Mr. Lightle testifying for DIRM supported the intraLATA competition Petitions of the IXC's. It was his opinion that competition in the intraLATA market could bring benefits to consumers, and specifically to the State of South Carolina.

CONCLUSIONS OF LAW

1. Based upon Sprint's and AT&T's request for unblocking of 10XXX on an intraLATA basis, the IXC's assertion that local basic service rates should not be impacted as a result of any unblocking of 10XXX, the agreement of the IXC's and the LEC's that a task force should be implemented, the agreement of the LEC's that they were not opposed to 10XXX intraLATA competition, and the fact that stipulations have been reached in other jurisdictions concerning these issues by industry task force, the Commission has determined that an industry task force should be set up to address the issues herein. The task force shall be headed up by the Commission Staff, and the task force shall have no more than six (6) months from the date of this Order to make a recommendation to the Commission concerning the resolution of the issues of the implementation of 10XXX intraLATA competition. The task force shall include all LEC's and all facility based IXC's, as well as the parties to this Docket, including the Consumer Advocate and DIRM.

2. Among the issues to be resolved by the industry task force are depooling of the intraLATA toll pool, whether or not intraLATA access charges are appropriate, whether or not the LEC's should be required to impute access charges to their intraLATA toll

services, whether or not there are any implementation costs to 10XXX and if so, who should bear those costs, and any other technical matters that are relevant to 10XXX intraLATA competition. The above listed issues are not intended to be all inclusive, and other issues may be taken up by the task force as appropriate.

3. It is the Commission's intention that the parties to the task force work together in good faith to resolve these issues. The mission of the task force is to bring a consensus to the Commission on how best to provide 10XXX on an intraLATA basis so that the contribution level to local basic service rates can be maintained at a level to prevent an increase in local basic service rates as a result of 10XXX intraLATA competition. The parties are directed to deal with each other in good faith and to be forthcoming in the provision of information needed to resolve the issues set up by the task force. The task force should not be used as an opportunity to reargue whether or not 10XXX intraLATA competition should be provided, rather, the task force is to address the issues arising from the implementation of 10XXX competition should the Commission order such. The task force has six (6) months to accomplish this goal. In the event that the task force is unable to resolve the issues, the Commission Staff will report the progress of the task force to the Commission and the Commission will then make further determinations as appropriate. If the task force resolves the issues and reaches a consensus, then that consensus will be presented to the Commission for its evaluation.

DOCKET NOS. 92-182-C, 92-183-C & 92-200-C - ORDER NO. 92-919
NOVEMBER 2, 1992
PAGE 8

4. An issue was raised as to whether or not extended area service plans could still be provided under 10XXX competition. It is not the Commission's intention to do away with any local expanded area calling service proposals that may be necessary to the areas making the request. Therefore, the LEC's or customers of LEC's are not prevented from proposing any new EAS requests for exchange areas.

5. The Commission agrees with Consumer Advocate witness Buckalew that it is not appropriate to grant "1+" intraLATA competition at this time. Therefore, MCI's Application is denied to the extent it requests "1+" intraLATA authority. However, to the extent that the Application seeks 10XXX authority, MCI's Application will be considered in the same manner as Sprint's and AT&T's.

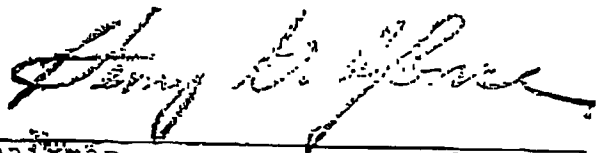
6. The Commission, in requiring the task force to seek a resolution to the various issues raised by 10XXX intraLATA competition, finds it unnecessary to adopt the two-phase deregulation approach espoused by Mr. Buckalew. Additionally, in

DOCKET NOS. 92-182-C, 92-183-C & 92-200-C - ORDER NO. 92-919
NOVEMBER 2, 1992
PAGE 9

light of the Commission's decision in Order No. 92-802. supra, and the testimony that the task force could accomplish its mission in a shorter time frame, Mr. Fichet's proposal to hold this decision in abeyance for 24 months is denied.

IT IS SO ORDERED.

BY ORDER OF THE COMMISSION:


Chairman

ATTEST:


Executive Director
(SEAL)

ATTACHMENT C

**Order No. 93-462; Docket Nos. 92-182-C,
92-183-C, and 92-200-C (June 3, 1993)**

(25 Pages)

REC'D JUN 07 1993

DECEMBER 7

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 92-182-C, 92-183-C & 92-200-C - ORDER NO. 93-462

JUNE 3, 1993

IN RE: DOCKET NO. 92-182-C)	
Application of MCI Telecommunications)	
Corporation for Authority to Provide)	
IntraLATA Telecommunications Services)	
in the State of South Carolina.)	
)	
DOCKET NO. 92-183-C)	ORDER
Application of Sprint Communications)	APPROVING
Company LP for Authority to Provide)	STIPULATION
IntraLATA Facilities Based Tele-)	AND AGREEMENT
communications Services in the State)	
of South Carolina.)	
)	
DOCKET NO. 92-200-C)	
Application of AT&T Communications)	
for Authority to Provide IntraLATA)	
Telecommunications Services in)	
South Carolina.)	

Pursuant to Commission Order No. 92-919, an industry task force consisting of all local exchange carriers (LEC's), all facility-based interexchange carriers (IXC's), as well as the parties to this Docket, including the Consumer Advocate for the State of South Carolina (the Consumer Advocate), and the Division of Information Resource Management (DIRM) was formed to study the possible resolution concerning the implementation of 10XXX intraLATA competition. This Commission stated that among the issues to be resolved by the industry task force were depooling of the intraLATA toll pool, whether or not intraLATA access charges

are appropriate; whether or not the LEC's should be required to impute access charges to their intraLATA toll services, whether or not there are any implementation costs to 10XXX and if so, who should bear those costs, and any other technical matters that are relevant to 10XXX intraLATA competition. The Commission stated in Order No. 92-919 that these issues were not intended to be all inclusive, and other issues could be taken up by the task force as appropriate.

The industry task force as constituted above met on several occasions, and now comes before this Commission requesting that this Commission approve the Stipulation and Agreement entered into by the members of the task force. The task force is to be commended for the admirable job it did in working together to find reasonable solutions to the many problems inherent in the institution of intraLATA competition.

The Commission notes with approval that if we approve this agreement, intraLATA competition will be opened to all IXC's certificated in South Carolina, including resellers.¹ The Commission further notes that pursuant to the many meetings of the task force, that the access arrangements to be unblocked under the Stipulation and Agreement have been expanded from 10XXX to include all of following: Feature Group A, Feature Group B, Feature Group D-10XXX only, 800, Outwats, and Special Access. The task force proposes that intraLATA competition begin within the latter of

1. The Commission would note that any such approval would not alter TeleCom USA's existing authority.

sixty (60) days from date of the Order, or forty-five (45) days from the date of the LEC receiving an access service request.

It should be noted that the Stipulation and Agreement contains a depooling plan under which 3 of the LEC's would be considered toll providers, 24 LEC's would be considered access providers. Further, the Stipulation and Agreement contains an imputation agreement. From the competition standpoint, this would require LEC toll providers to price toll services above access charges.

The Commission has reviewed the proposed Stipulation and Agreement and finds that it is in the public interest that the agreement be approved. The Stipulation and Agreement provides many reasonable solutions to the numerous problems that come into play when the issue of intraLATA competition is considered. It is the belief of this Commission that the Stipulation and Agreement as drafted presents a reasonable consensus opinion of all the parties participating in the task force.

IT IS THEREFORE ORDERED THAT:

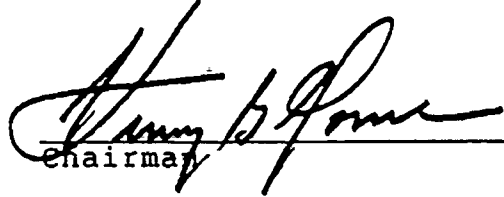
1. The May 10, 1993 Stipulation and Agreement as presented by the industry task force in these Dockets and attached hereto as Appendix A is hereby approved.

2. That the Stipulation and Agreement becomes effective sixty (60) days from the date of this Order, or forty-five (45) days from the date of the LEC receiving an access service request.

3. That the Commission finds that imputation is appropriate and shall be implemented as set forth in the approved Stipulation and Agreement.

4. That this Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:


Chairman

ATTEST:


Executive Director
(SEAL)

BEFORE

THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 92-182-C/92-183-C and 92-200-C - ORDER NO. 92-480

MAY 10, 1993

IN RE:	92-182-C - Application of MCI)	
	Telecommunications Corporation for)	
	Authority to Provide IntraLATA)	
	Telecommunications Services in the)	STIPULATION
	State of South Carolina)	AND
)	AGREEMENT
	92-183-C - Application of Sprint)	
	Communications Company L.P. for)	
	Authority to Provide IntraLATA)	
	Facilities-Based Telecommunications)	
	Services in the State of South Carolina)	
	92-200-C - Application of AT&T)	
	Communications for Authority to Provide)	
	IntraLATA Telecommunications Services in)	
	the State of South Carolina)	

WHEREAS, in PSC Docket Nos. 92-182-C, 92-183-C and 92-200-C, the South Carolina Public Service Commission (the "PSC" or the "Commission") considered the requests of AT&T Communications ("AT&T"), MCI Telecommunications Corporation ("MCI") and Sprint Communications Company L.P. ("Sprint") for authority to complete intraLATA telephone calls; and

WHEREAS, the Commission ruled in its Order No. 92-919 issued on November 2, 1992 (the "Order") that it was not in the public interest at that time to grant the requests of 1+ intraLATA competition; however, the Commission ordered that a task force be formed to study the issues inherent in the authorization of limited intraLATA competition in South Carolina and to make recommendations to the Commission in that regard; and

WHEREAS, pursuant to the Order, the South Carolina Task Force on IntraLATA Competition (the "Task Force") was formed under the auspices of the staff of the Commission; and

WHEREAS, the Task Force, which has consisted of representatives of certain of the interexchange carriers doing business in South Carolina (the "IXC's"), the local exchange companies doing business in South Carolina (the "LEC's") and other interested parties, all of whom are the signatories to this Stipulation and Agreement, have agreed on the terms under which limited intraLATA competition may be implemented in South Carolina:

NOW THEREFORE, the members of the Task Force hereby agree, stipulate and make the following recommendations to the Commission:

1. If the Commission finds this stipulation and agreement to be in the public interest, upon the issuance and effectiveness of its order to that effect, AT&T, MCI and Sprint will be granted statewide authority to originate and to terminate toll calls within the same LATA through the following access arrangements and dialing patterns (or their functional equivalent): Feature Group A, Feature Group B, Feature Group D-10XXX only, 800, OutWATS (to the extent not screened by any LEC) and special access (provided that the IXC uses LEC facilities from its Point of Presence ("POP") to the end user). It is understood that this shall not preclude an IXC from completing intraLATA toll calls using access which is appropriately obtained in compliance with the orders, rules and regulations of the FCC or this Commission. It is

understood that this Stipulation and Agreement is not intended to alter the authority granted to SouthernNet of South Carolina, d/b/a Telecom*USA, by the South Carolina Public Service Commission in Order No. 82-3, Docket No. 81-28-C, dated January 5, 1982, and any subsequent orders of the Commission relating to such authority.

2. The implementation by the LEC's of unblocking the access and dialing patterns as set forth in subparagraph 1 above shall occur as soon as is practically and technically feasible. It is contemplated the unblocking will occur within the later of 60 days from the effective date of the order implementing this stipulation and agreement or 45 days from the date an LEC receives an Access Service Request ("ASR") and Translations Questionnaire ("TQ") from any IXC approved to carry intraLATA toll traffic. Applicable ordering charges will apply.

3. The intraLATA toll pooling agreement currently in effect among the LEC's shall be terminated as soon as is feasible after the date of the order implementing this stipulation and agreement. The LEC's shall implement depooling under the guidelines attached hereto as "Exhibit A" and incorporated herein as if set forth verbatim. It is expressly understood that, in the event the LEC's are unable to implement the guidelines by the effective date of such order, the LEC's will implement intraLATA competition by unblocking as set forth in subparagraphs 1 and 2 and will charge all IXCs, including resellers, any residual charges calculated pursuant to the depooling guidelines as of the effective date of such order at such later time as the depooling guidelines

are implemented. That is to say, if the Commission approves this stipulation, it is expressly understood that all IXC's, including resellers, certified in South Carolina will pay access charges to each LEC in accordance with its authorized access tariff, paragraph 5 following, and in accordance with Exhibit "A."

4. The attached "Exhibit B," which is incorporated herein as if set forth verbatim, represents the position of the parties regarding the appropriate means of implementing an imputation standard if the Commission deems imputation to be appropriate.

5. As of the effective date of any order approving this stipulation and agreement, all compensation payments for unauthorized intraLATA toll traffic associated with the dialing patterns and access arrangements specified in subparagraph 1 hereof shall cease. In lieu thereof, all "access providers" (as that term is defined in Exhibit A hereto) will increase the residual access element (as such term is defined in Exhibit A hereto) by the level of such compensation received for the calendar year 1992. Additionally, all "toll providers" (as that term is defined in Exhibit A hereto), except United Telephone, shall recover the net amount of such compensation received for the calendar year 1992, including the incremental charges paid by such toll provider to its access providers due to their loss of compensation payments, through access charges. Southern Bell and GTE shall file a revised access tariff reflecting the modified access charges within thirty

(30) days of Commission approval of this Stipulation and Agreement.

6. The parties to this Stipulation agree that Docket Nos. 92-182-C, 92-183-C and 92-200-C were established to deal with the issue of intraLATA toll competition. The parties to this Stipulation agree that Docket Nos. 92-182-C, 92-183-C and 92-200-C should be concluded effective with the date of the Order which approves this Stipulation. This Stipulation and Agreement represents a compromise which all parties hereto recommend to the Commission with the understanding that if this settlement is not approved in its entirety, each party is free to withdraw from this Stipulation and settlement and to litigate all issues concerning the authorization of intraLATA toll competition in South Carolina.

This agreement may be executed in more than one original counterparts. Each original counterpart shall constitute a valid and binding agreement.

Dated as of this 10th day of May, 1993.

BELLSOUTH TELECOMMUNICATIONS,
INC.

By: W. J. Mow

UNITED TELEPHONE OF THE
CAROLINAS, INC.

By: James B Wright

GTE SOUTH, INC. AND
CONTEL OF SOUTH CAROLINA,
INC. d/b/a GTE SOUTH CAROLINA

By: Norman L. Sime

SOUTH CAROLINA TELEPHONE
COALITION

By: A. Everett Bruce

AT&T COMMUNICATIONS OF THE
SOUTHERN STATES, INC.

By: Dwight R. Follenauer

SPRINT COMMUNICATIONS COMPANY,
L. P.

By: Jonny H. Key

MCI TELECOMMUNICATIONS
CORPORATION

By: Ned R. Larsen

SOUTH CAROLINA BUDGET AND
CONTROL BOARD, DIVISION
OF INFORMATION RESOURCE
MANAGEMENT (DIRM)

By: [Signature]

LDOS OF SOUTH CAROLINA/ATC
LONG DISTANCE

By: [Signature]

South Carolina IntraLATA DEPOOLING PLAN

The following South Carolina IntraLATA Depooling Plan ("the Plan") is submitted by the undersigned to the IntraLATA Competition Task Force organized under the auspices of the South Carolina Public Service Commission pursuant to PSC Order No. 92-919 in PSC Docket Nos. 92-182-C; 92-183-C and 92-200-C (the "Order"). The Purpose of the Plan is to set forth the general principles by which participating local exchange carriers ("LECs") in South Carolina will eliminate the current intraLATA toll pooling arrangement (the "intraLATA toll pool") and be compensated for intraLATA traffic in a limited competitive environment if so ordered by the Commission. The Plan is summarized as follows:

1. The depooling plan is intended to be revenue neutral for all South Carolina Coalition Members that are access providers and consistent with Attachment I.
2. Southern Bell, General Telephone (GTE) and United will act as toll providers and as such will establish toll rates and be responsible for compensating one another for all intraLATA traffic terminated in their respective areas.

3. All other pooling local exchange carriers (LECs) have the option to be either a toll provider or an access provider. If a LEC becomes a toll provider, they will be responsible for establishing toll rates applicable to their subscribers and, in accordance with Paragraph 2 above, must pay terminating access to other toll providers. If a local exchange carrier opts to be an access provider they will charge their subscribers the same intraLATA toll rates that are applicable to the applicable Toll Provider's subscribers; report the toll revenue to the Toll Provider; and in turn, bill the Toll Provider for access, including billing and collection and operator services, if applicable. Netting of toll revenue and carrier billing is contemplated.
4. Independent to Independent (I-I) intraLATA toll traffic for access providers will be treated in a similar manner as Independent-Bell (I-B) traffic, i.e., toll revenues will be reported to the Toll Provider and the Toll Provider will pay access for this traffic. Toll traffic between toll providers will be treated as provided for in Paragraph 2 above.
5. While it is anticipated that Southern Bell will be the toll provider for all access providers, an access provider may become an access provider of a toll provider other than Southern Bell, if that toll provider agrees to that arrangement. Should another Toll Provider be chosen by the

Access Provider, the toll rates of the chosen Toll Provider will be used.

6. Access rates for toll providers and access providers will be consistent with each Company's intrastate/interLATA access charge rates, except as provided for in paragraph 7 following.
7. A residual rate element applicable to both intraLATA and interLATA local switching access minutes will be assessed by access providers to all toll providers and interexchange carriers (IXCs) to facilitate revenue neutrality in accordance with Attachment I, the Development of Residual Rate Element.
8. Billing and collection services currently being provided will continue to be provided by access providers to the toll provider until such time as presubscribed 1+, 0+, and 0- intraLATA equal access is authorized by the Commission and is implemented. During the term of this agreement, billing and collection rates should not exceed the level of rates currently approved by the Commission.
9. An access provider currently providing intraLATA operator services (Interexchange-Network Services) for themselves or under contract for other LECs will continue for the period contemplated by this Plan. The rates charged for this service should be fair and equitable and will not exceed the end user

tariff charges. Operator services, including 411 and 555 directory assistance, will be handled under separate contract.

10. Uncollectible revenues for access providers will be handled under the same guidelines as existed prior to depooling. For those companies that historically settled on a cost basis for intraLATA settlements, uncollectibles will be limited to 1-1/2% of billed intraLATA toll revenue (on an annual basis). For those companies that historically settled on an average schedule basis for intraLATA settlements, the average schedule formulas included a factor for uncollectibles and therefore under the depooling plan uncollectibles will automatically be included as a cost item (see Attachment 1, paragraph 1).

In defining uncollectibles for the purpose of the 1-1/2% limit, and for historically average schedule companies, the following items are excluded as uncollectibles and therefore are directly reimbursable for both cost and average schedule companies: unbillables, documented fraud, "old toll" - defined as more than 90 days old, intraLATA 900 revenues and out-of-state intraLATA revenues.

11. Access providers will be precluded from diverting their 1+ and/or 0+ intraLATA toll traffic currently being passed to Southern Bell to a reseller or other interexchange carrier. This provision is not intended to preclude an access provider

from initiating an intraLATA network reconfiguration so long as it will not result in additional cost to the toll provider.

12. All LECs agree to provide a duplicate record of all 1+, 0+ and 0- originating intraLATA traffic to a centralized point to accommodate this Plan.
13. At the outset, consistent with interLATA FGC carrier access billing procedures as provided for in NECA Tariff No. 5, access providers will establish intraLATA terminating usage based on a terminating-to-originating (T-O) ratio that is consistent with the manner in which the base period demand usage was established for rate development. The ultimate objective is to periodically update the T-O ratios based on actual data.
14. If 1+, 0+, and 0- presubscribed intraLATA equal access competition is implemented, the primary carrier plan will be terminated, however, with mutual consent, certain of the procedures contained herein may be continued.
15. After initiation of Depooling Plan the respective companies will still be allowed to change from being an access provider to being a toll provider or vice versa. Such change, however, will be limited to one change each way for a total of two changes and not more than one change in any twelve month

period. An example would be, if a LEC chose to be an access provider upon initiation of the Depooling Plan, that LEC could subsequently choose to change to being a toll provider twelve months later and, twelve months thereafter could change back to becoming an access provider.

ATTACHMENT I

Development of Residual Access Rate

1. Base Year Intrastate IntraLATA Settlements (toll and private line). Settlement level for cost based companies is defined as intraLATA allocation factors applicable to 1991 and investment, expenses and taxes for calendar 1992. Settlements for average schedule companies is defined as actual intraLATA settlements for calendar year 1992.
2. Intrastate IntraLATA Carrier Common Line Revenue (Base year demand information multiplied by company's Intrastate InterLATA CCL rates.)
3. Intrastate IntraLATA Switched Access Revenues (Base year demand information multiplied by company's Intrastate InterLATA switched access rates.)
4. Intrastate IntraLATA Special Access Revenues (Base year demand information multiplied by company's Intrastate InterLATA special access rates.)
5. Intrastate IntraLATA Billing and Collection Revenues (Base year demand information multiplied by Company's intrastate interLATA billing and collection rates.)

6. Intrastate IntraLATA Interexchange (Network) revenues for base period.
7. Residual Access Revenue [paragraph 1 - (paragraphs 2 + 3 + 4 + 5 + 6)].
8. Total Intrastate IntraLATA and InterLATA Local Switching Access Minutes for Base Year. (Includes originating and terminating demand for FGA, FGB, FGC, and FGD or equivalent services.)
9. Residual Access Rate (paragraph 7 ÷ by paragraph 8) which will be applicable to both intraLATA and interLATA local switching access minutes for the life of the Plan.

BELLSOUTH TELECOMMUNICATIONS,
INC.

By: W. J. Mooney

SOUTH CAROLINA TELEPHONE
COALITION

By: A. L. Smith

GTE SOUTH, INC. AND
CONTEL OF SOUTH CAROLINA, INC.
d/b/a GTE South Carolina

By: Stan Buge

UNITED TELEPHONE OF THE
CAROLINAS, Inc.

By: C. Steve Baul

Columbia, SC
March 12, 1993

EXHIBIT B

Page 1 of 2

April 2, 1993

1. Definition of Toll Services

The Local Exchange Companies do not see any need to revise the definition of toll services. Toll services should be defined as those services offered under the toll sections of the General Subscriber Services Tariff (GSST). Those sections are A18 and A19.

2. Applicable to Prospective Services Only

The Local Exchange Companies do not agree that imputation guidelines are appropriate. However, if the Commission deems that these guidelines are necessary for an interim period, the Local Exchange Companies agree that the imputation requirements should apply only to prospective toll services (including modifications to existing toll services) effective on or after 3/1/93. All existing toll services, i.e., toll services effective before 3/1/93 that do not cover the appropriate access charges should be grandfathered. Additionally, existing (grandfathered) toll tariffs of certain Local Exchange Companies may be concurred in by other Local Exchange Companies or could be mirrored without having to meet imputation guidelines. However, nothing in this paragraph shall be construed to compromise or otherwise prejudice any parties' position on future or pending proposals that would address the classification of services or reclassification of toll services to other categories.

3. Applicable to BellSouth, GTE and United Telephone Companies Only

The Local Exchange Companies do not agree that imputation guidelines are appropriate. However, if the Commission deems that these guidelines are necessary for an interim period of time then the Local Exchange Companies would support having the imputation requirements, approved by the Commission, apply only to Southern Bell, GTE and United. Additionally, these requirements should only apply to prospective services on a service by service basis.

4. Applicable Service By Service

The Local Exchange Companies do not agree that imputation guidelines are appropriate. However, if the Commission deems that these guidelines are necessary for an interim period of time then the Local Exchange Companies would support having the imputation requirements. The Local Exchange Companies would agree that the imputation requirements should apply on a service by service basis. Additionally, as stated in response to 2 above, all existing services that do not cover the appropriate access charges should be grandfathered.

EXHIBIT B

Page 2 of 2

5. Applicable to IXC's

The Local Exchange Companies do not agree that imputation guidelines are appropriate. However, if the Commission deems that these guidelines are necessary for an interim period of time then the Local Exchange Companies would support having the imputation requirements. The IXC's will cover the appropriate intrastate costs of providing intrastate toll services when establishing the South Carolina rates for these services. Additionally, the IXC's will continue to provide state-wide average toll rates until such time as the Commission approves an alternative structure..

April 2, 1993

EXHIBIT B
Attachment 1
Page 1 of 1

SOUTHERN BELL - SOUTH CAROLINA

A. INTRASTATE SWITCHED ACCESS

	1 ORIGINATING	2 TERMINATING	3 TOTAL
CCL	\$.03350	\$.04822	\$.08172
LINE TERMINATION	.0079	.0079	.0158
LOCAL SWITCHING 2	.0098	.0098	.0196
LOCAL TRANSPORT (AVG.)	.0125	.0125	.0250
INFORMATION SURCHARGE	.000266	.000266	.000532
SUB TOTAL	\$.063966	\$.078686	\$.142652
TIME-OF-DAY FACTOR	.926 [*]	.926 [*]	.926 [*]
TOTAL	\$.059232	\$.072863	\$.132095
CONVERSATION MINUTES	X 1.10000	---	---
	\$.065155	\$.072863	\$.138018

* BUSINESS TIME-OF-DAY FACTOR

B. INTERSTATE SPECIAL ACCESS (DS1)

1. ASSUMED USAGE PER VOICE GRADE EQUIVALENT - 9,000 MINUTES
2. LOCAL CHANNELS @\$147.90 EA. = \$ 295.80
3. SPECIAL TRANSPORT - FIXED = 100.00
4. ASSUMED TRANSPORT - 5.5 MILES (\$28.00 EACH MILE) = 154.00
5. TOTAL (LINES 2 + 3 + 4) = \$ 549.80
6. 24 CHANNELS X 85% FILLED = 21 CHANNELS
(\$549.80 DIVIDED BY 21) = \$ 26.18
7. MINUTE OF USE RATE (LINE 6 DIVIDED BY LINE 1) = \$.002909

C. THE APPROPRIATE ACCESS CHARGES TO BE COVERED IN TOLL RATES

1. INWARD PLAN (A1 + B7) - \$.0652 + \$.0029 = \$.0681
2. OUTWARD PLAN (A2 + B7) - \$.0729 + \$.0029 = \$.0758

D. FORMULA FOR DETERMINING THE CROSS OVER POINT - GOING FROM TWO ENDS OF SWITCHED ACCESS TO ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS

B5 DIVIDED BY A1 = MINUTES OF USE DIVIDED BY 60 = HOURS

INWARD
\$549.80 / \$.0729 = 7,542 / 60 MINS. = 126 INTRASTATE HOURS

OUTWARD
\$549.80 / \$.0652 = 8,433 / 60 MINS. = 141 INTRASTATE HOURS

THE CROSS OVER POINTS REQUIRING THE LECs TO INCLUDE ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS FOR SOUTHERN BELL IN SOUTH CAROLINA IS 126 HOUR FOR INWARD PLANS AND 141 HOURS FOR OUTWARD PLANS.

UNITED TELEPHONE OF THE CAROLINAS, INC. SOUTH CAROLINA

A. INTRASTATE SWITCHED ACCESS

	1	2	3
	ORIGINATING	TERMINATING	TOTAL
CARRIER COMMON LINE	\$0.034578	\$0.097388	\$0.131966
LOCAL SWITCHING 2	0.008467	0.008467	0.016934
LOCAL TRANSPORT (AVG.)	0.009192	0.009192	0.018384
INFORMATING SURCHARGE	0.000239	0.000239	0.000478
SUB-TOTAL	0.052476	0.115286	0.167762
TIME-OF-DAY FACTOR	1	1	1
TOTAL	\$0.052476	\$0.115286	\$0.167762
CONVERSATION MINUTES x	1.1		
	\$0.057724	\$0.115286	\$0.167762 .173010

B. INTERSTATE SPECIAL ACCESS (DS1)

1. ASSUMED USAGE PER VOICE GRADE EQUIVALENT -	9,000 MINUTES
2. SERVICE TERMINATIONS @ \$187.00 EA.	\$374.00
3. LOCAL TRANSPORT - FIXED	\$60.00
4. LOCAL TRANSPORT - 5.5 MILES (\$23.00 PER MILE)	\$126.50
5. TOTAL (LINES 2 + 3 + 4)	\$560.50
6. 24 CHANNELS - 85% FILLED = 21 CHANNELS (\$560.50 DIVIDED BY 21)	\$26.69
7. MINUTE OF USE RATE (LINE 6 DIVIDED BY LINE 1)	\$0.002966

C. THE APPROPRIATE ACCESS CHARGES TO BE COVERED IN TOLL RATES

1. INWARD PLAN (A1 + B7)	0.060690
2. OUTWARD PLAN (A2 + B7)	0.118252

D. FORMULA FOR DETERMINING THE CROSS OVER POINT - GOING FROM TWO ENDS OF SWITCHED ACCESS TO ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS

B5 DIVIDED BY A1 = MINUTES OF USE DIVIDED BY 60 = HOURS

INWARD

\$560.50 / .115286 / 60 MINUTES = 81.0 INTRASTATE HOURS

OUTWARD

\$560.50 / .057724 / 60 MINUTES = 161.8 INTRASTATE HOURS

THE CROSS OVER POINTS REQUIRING THE LECs TO INCLUDE ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS FOR UNITED TELEPHONE OF THE CAROLINAS IN SOUTH CAROLINA IS 81.0 HOURS FOR INWARD PLANS AND 161.8 HOURS FOR OUTWARD PLANS.

May 5, 1993

GTE SOUTH, INC. - SOUTH CAROLINA

A. INTRASTATE SWITCHED ACCESS

	1 ORIGINATING	2 TERMINATING	3 TOTAL
CCL (1)	\$0.05561400	\$0.05561400	\$0.11122800
SWITCHED TRANSPORT			
TERMINATION (2)	\$0.01210140	\$0.01210140	\$0.02420280
LS2	\$0.01675570	\$0.01675570	\$0.03351140
SWITCHED TRANSPORT			
FACILITY (3)	\$0.01450000	\$0.01450000	\$0.02900000
INFORMATION SURCHARGE	\$0.00059400	\$0.00059400	\$0.00118800
SUB TOTAL	\$0.09956510	\$0.09956510	\$0.19913020
TOTAL	\$0.09956510	\$0.09956510	\$0.19913020
CONVERSATION MINUTES	1.10000	---	---
	\$0.10952161	\$0.09956510	\$0.20908671

- (1) CCL RATE SHOWN IS THE EFFECTIVE 1992 CALCULATED RATE PER MINUTE. ACTUAL RATE IS \$3.84 PER ACCESS LINE PER MONTH. THE EFFECTIVE RATE SHOULD BE UPDATED WHEN MAKING THE IMPUTATION TEST.
- (2) RATE MULTIPLIED BY 2
- (3) RATE USED IS AN AVERAGE RATE

B. INTRASTATE SPECIAL ACCESS (DS1)

1.	ASSUMED USAGE PER VOICE GRADE EQUIVALENT - 9000 MINUTES	TOTAL
2.	LOCAL CHANNEL (SPECIAL ACCESS LINE) X 2	= \$367.16
3.	SPECIAL TRANSPORT FIXED (TERMINATION)	= \$53.14
4.	ASSUMED TRANSPORT (PER AIR MILE) X 5.5	= \$35.18
5.	TOTAL (LINES 2 + 3 + 4)	= \$455.48
6.	24 CHANNELS X 85% FILLED = 21 CHANNELS	(\$980.95 DIVIDED BY 21)
7.	MINUTE OF USE RATE (LINE 6 DIVIDED BY LINE 1)	\$46.21
C.	THE APPROPRIATE ACCESS CHARGES TO BE COVERED IN TOLL RATES	\$0.005190
1.	INWARD PLAN (A1 + B7) - \$.1095 + \$.0052	\$0.1147
2.	OUTWARD PLAN (A2 + B7) - \$.0996 + \$.0052	\$0.1048

D. FORMULA FOR DETERMINING THE CROSS OVER POINT - GOING FROM TWO ENDS OF SWITCHED ACCESS TO ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS

B5 DIVIDED BY A1 = MINUTES OF USE DIVIDED BY 60 = HOURS

INWARD

\$980.95 / .09956510 / 60 MINS. = 164 INTRASTATE HOURS

OUTWARD

\$980.95 / .10952161 / 60 MINS. = 149 INTRASTATE HOURS

THE CROSS OVER POINTS REQUIRING THE LECS TO INCLUDE ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS FOR GTE SOUTH, INC. IN SOUTH CAROLINA IS 164 HOURS FOR INWARD PLANS AND 149 HOURS FOR OUTWARD PLANS.

May 5, 1993

CONTEL - SOUTH CAROLINA

A. INTRASTATE SWITCHED ACCESS

	1 ORIGINATING	2 TERMINATING	3 TOTAL
CCL (1)	\$0.018248	\$0.018248	\$0.036500
LINE TERMINATION (CIRCUIT CONNECT)	\$0.005100	\$0.005100	\$0.010200
LS2	\$0.013790	\$0.013790	\$0.027580
LOCAL TRANSPORT (2)	\$0.006000	\$0.006000	\$0.006000
INFORMATION SURCHARGE	\$0.001230	\$0.001230	\$0.002460
SUB TOTAL	\$0.044400	\$0.044400	\$0.088700
TOTAL	\$0.044370	\$0.044370	\$0.088740
CONVERSATION MINUTES	1.1000		
	\$0.048800	\$0.044370	\$0.093200

- (1) CCL RATE SHOWN IS THE EFFECTIVE 1992 CALCULATED RATE PER MINUTE. THE ACTUAL RATE IS \$0.94 PER ACCESS LINE PER MONTH. THE EFFECTIVE RATE SHOULD BE UPDATED WHEN MAKING THE IMPUTATION TEST.
- (2) RATE USED IS AN AVERAGE RATE

B. INTRASTATE SPECIAL ACCESS (DS1)

1. ASSUMED USAGE PER VOICE GRADE EQUIVALENT - 9000 MINUTES		TOTAL
2. LOCAL CHANNEL (CIRCUIT TERMINATION)	= \$110.83	\$221.66
3. SPECIAL TRANSPORT FIXED (CIRCUIT MILEAGE)	= \$38.02	\$38.02
4. ASSUMED TRANSPORT PER MILE RATE X 5.5	= \$15.09	\$83.50
5. TOTAL (LINES 2 + 3 + 4)	=	\$342.68
6. 24 CHANNELS X 85% FILLED = 21 CHANNELS (\$342.68 DIVIDED BY 21)		\$16.32
7. MINUTE OF USE RATE (LINE 6 DIVIDED BY LINE 1)		\$0.001843
C. THE APPROPRIATE ACCESS CHARGES TO BE COVERED IN TOLL RATES		
1. INWARD PLAN (A1 + B7) - \$0.0488 + \$0.0018		\$0.0506
2. OUTWARD PLAN (A2 + B7) - \$0.0444 + \$0.0018		\$0.0462

D. FORMULA FOR DETERMINING THE CROSS OVER POINT - GOING FROM TWO ENDS OF SWITCHED ACCESS TO ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS

B5 DIVIDED BY A1 = MINUTES OF USE DIVIDED BY 60 = HOURS

INWARD

\$342.68 / .04437 / 60 MINS. = 129 INTRASTATE HOURS

OUTWARD

\$342.68 / .04880 / 60 MINS. = 117 INTRASTATE HOURS

THE CROSS OVER POINTS REQUIRING THE LECs TO INCLUDE ONE END OF SWITCHED ACCESS AND ONE END OF SPECIAL ACCESS FOR CONTEL - SOUTH CAROLINA IS 129 HOURS FOR INWARD PLANS AND 117 HOURS FOR OUTWARD PLANS.

ATTACHMENT D

Exhibit Detailing Distribution of Traffic

(1 Page)

UNITED TELEPHONE COMPANY
OF THE CAROLINAS
SOUTH CAROLINA

MOU	BELL TO UNITED				UNITED TO BELL			
	Apr-98		May-98		Apr-98		May-98	
ACP								
MEASURED	184,236	4.4%	171,171	4.4%	369,454	32.9%	371,122	33.2%
FLAT RATE	2,777,471	65.6%	2,544,449	66.1%	185,203	16.5%	185,579	16.6%
2-WAY	855,091	20.2%	858,244	22.3%	185,203	16.5%	185,579	16.6%
1-WAY	1,922,380	45.4%	1,686,205	43.8%	0	0.0%	0	0.0%
TOTAL ACP	2,961,707	69.9%	2,715,620	70.6%	554,657	49.4%	556,701	49.8%
TOLL	1,272,834	30.1%	1,132,296	29.4%	567,969	50.6%	560,139	50.2%
TOTAL	4,234,541		3,847,916		1,122,626		1,116,840	

ROUTES*	BELL TO UNITED	UNITED TO BELL
ACP		
MEASURED	504	66
FLAT		
2-WAY	59	59
1-WAY	536	0
TOTAL	1,099	125
TOLL	898	807
TOTAL	1,997	932

* Routes as of May98 with usage

ATTACHMENT E

**Bills Rendered by Complainant
United to BellSouth**

(22 Pages)



United Telephone Co. of the Carolinas
 6860 W. 115th Street
 MS: KSOPKD0116
 Overland Park, KS 66211

Invoice No 01990506

Bill Date 01/08/99

Issue Date 01/08/99

Ms. Marilee Calvert
 BellSouth Telecommunications
 600 N 19th, 3rd Floor Bin 3-5
 P O Box 771
 Birmingham, Alabama 35203

Remit Payment to:
 United Telephone Co. of the Carolinas
 Attn: Judy Weinzierl
 Intralata Settlements & Billing
 6860 West 115th Street
 Overland Park, KS 66211
 Phone (913) 433-1656

- Description -

Traffic Sensitive Recovery of One Way ACP Usage
 Between
 United Telephone Co. of the Carolinas
 and
 BellSouth Telecommunications

(See attached pages for calculation of charges.)

	Due BELLSOUTH	Due UTCC/Sprint
Net Amount Due	\$ 787,390.60	\$ 787,390.60
Adjustments*	\$ -	\$ -
Total Amount Due	\$ 787,390.60	\$ 787,390.60

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELLSOUTH**

ACP USAGE	OCT 96 - DEC 96	JAN 97 - MAR 97	APR 97 - DEC 97	JAN 98 - NOV 98	TOTAL
TOTAL FLAT RATE USAGE	6,356,614	6,626,187	21,631,438	29,005,051	63,619,290
LESS TWO WAY USAGE	2,019,061	2,083,223	6,705,211	9,017,101	19,824,596
ONE WAY USAGE (BELL TO SPRINT)	4,337,553	4,542,965	14,926,227	19,987,950	43,794,695
TS RATE	0.015892	0.015892	0.018510	0.018510	
AMOUNT	\$68,932.39	\$72,196.79	\$276,284.46	\$369,976.95	\$787,390.60

1997 usage was annualized based on 9 months of actual usage. Jan., Jun. and Jul. usage was not available.

1998 usage is actuals Jan - Jun. Jul - Nov is an average of Jan - May. Jun actuals appear to be low. We have not received ACP statements from BellSouth for Jul - Nov.



United Telephone Co. of the Carolinas
 6860 W. 115th Street
 MS: KSOPKD0116
 Overland Park, KS 66211

Invoice No 04990506

Bill Date 05/10/99

Issue Date 05/10/99

Ms. Marilee Calvert
 BellSouth Telecommunications
 600 N 19th, 3rd Floor Bin 3-5
 P O Box 771
 Birmingham, Alabama 35203

Remit Payment to:
 United Telephone Co. of the Carolinas
 Attn: Judy Weinzierl
 Intralata Settlements & Billing
 6860 West 115th Street
 Overland Park, KS 66211
 Phone (913) 433-1656

- Description -

Traffic Sensitive Recovery of One Way ACP Usage
 Between
 United Telephone Co. of the Carolinas
 and
 BellSouth Telecommunications

(See attached pages for calculation of charges.)

	Due BELLSOUTH	Due UTCC/Sprint
Net Amount Due	\$ -	\$ 94,281.81
Adjustments*	\$ -	\$ -
Total Amount Due	\$ -	\$ 94,281.81

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELLSOUTH**

ACP USAGE	DEC 1998	JAN 1999	FEB 1999	TOTAL
TOTAL FLAT RATE USAGE	1,982,598	2,817,767	2,568,792	7,369,157
LESS TWO WAY USAGE	621,962	871,031	782,603	2,275,596
ONE WAY USAGE (BELL TO SPRINT)	1,360,636	1,946,736	1,786,189	5,093,561
TS RATE	0.018510	0.018510	0.018510	0.018510
AMOUNT	\$25,185.36	\$36,034.08	\$33,062.36	\$94,281.81

SOUTH CAROLINA

TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELL SOUTH
1999

	<u>Estimated MOUs</u> <u>Billed January 8, 1999</u>			<u>Total</u> <u>Three</u> <u>Months</u> <u>Estimated</u>	<u>Actuals</u> <u>9/98 - 12/98</u> <u>Four</u> <u>Months</u>	<u>Difference</u> <u>Est/Act</u> <u>Equals</u> <u>Dec-98</u>
	Sep-98	Oct-98	Nov-98			
TOTAL FLAT RATE	2,752,312	2,752,312	2,752,312	8,256,936	10,239,534	1,982,598
ALDL	80,542	80,542	80,542	241,627	333,412	91,785
BAVL	9,449	9,449	9,449	28,346	30,096	1,750
BMBR	6,992	6,992	6,992	20,975	32,163	11,188
BRWL	7,288	7,288	7,288	21,865	90,906	69,041
CLTN	192,518	192,518	192,518	577,553	690,292	112,739
DNMK	8,917	8,917	8,917	26,752	44,213	17,461
EDBH	3,320	3,320	3,320	9,961	32,329	22,368
FNIN	30,074	30,074	30,074	90,222	143,033	52,811
HNPH	229,891	229,891	229,891	689,674	839,059	149,385
JONN	64,045	64,045	64,045	192,136	207,980	15,844
ORBG	143,802	143,802	143,802	431,407	633,923	202,516
SPFD	1,748	1,748	1,748	5,243	11,705	6,462
STGR	62,711	62,711	62,711	188,134	56,746	(131,388)
TOTAL 2-WAY	841,298	841,298	841,298	2,523,895	3,145,857	621,962

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELLSOUTH
1999**

	Jan-99	Feb-99
TOTAL FLAT RATE	2,817,767	2,568,792
ALDL	95,193	86,593
BAVL	8,873	6,904
BMBR	12,370	9,711
BRWL	28,756	22,581
CLTN	210,240	191,885
DNMK	10,574	8,314
EDBH	8,473	4,835
FNIN	38,743	37,132
HNPB	229,575	221,584
JONN	45,688	31,010
ORBG	179,145	159,444
SPFD	3,350	2,277
STGR	51	333
TOTAL 2-WAY	871,031	782,603



United Telephone Co. of the Carolinas
6860 W. 115th Street
MS: KSOPKD0116
Overland Park, KS 66211

Invoice No 04990506

Bill Date 05/10/99

Issue Date 05/10/99

Ms. Marilee Calvert
BellSouth Telecommunications
600 N 19th, 3rd Floor Bin 3-5
P O Box 771
Birmingham, Alabama 35203

Remit Payment to:
United Telephone Co. of the Carolinas
Attn: Judy Weinzler
Intralata Settlements & Billing
6860 West 115th Street
Overland Park, KS 66211
Phone (913) 433-1656

- Description -

Traffic Sensitive Recovery of One Way ACP Usage
Between
United Telephone Co. of the Carolinas
and
BellSouth Telecommunications
Revised Bill

(See attached pages for calculation of charges.)

	Due BELLSOUTH	Due UTCC/Sprint
Net Amount Due	\$ 1,111.11	\$ 1,111.11
Adjustments*	\$ 0.00	\$ 0.00
Total Amount Due	\$ 1,111.11	\$ 1,111.11

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELLSOUTH**

ACP USAGE	DEC 1998*	JAN 1999	FEB 1999	TOTAL
TOTAL FLAT RATE USAGE	2,370,131	2,817,767	2,568,792	7,756,690
LESS TWO WAY USAGE	749,412	871,031	782,603	2,403,046
ONE WAY USAGE (BELL TO SPRINT)	1,620,719	1,946,736	1,786,189	5,353,644
TS RATE	0.018510	0.018510	0.018510	0.018510
AMOUNT	\$29,999.50	\$36,034.08	\$33,062.36	\$99,095.94

* Revised December 1998 amount.

SOUTH CAROLINA

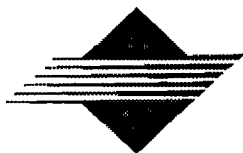
TRAFFIC SENSITIVE RECOVERY OF ONE - WAY ACP USAGE FROM BELL SOUTH 1999

	<u>Estimated MOUs</u> <u>Billed January 8, 1999</u>			<u>Total</u> <u>Three</u> <u>Months</u> <u>Estimated</u>	<u>Actuals</u> <u>9/98 - 12/98</u> <u>Four</u> <u>Months</u> <u>REVISED</u>	<u>Difference</u> <u>Est/Act</u> <u>Equals</u> <u>Dec-98</u>
	<u>Sep-98</u>	<u>Oct-98</u>	<u>Nov-98</u>			
TOTAL FLAT RATE	2,752,312	2,752,312	2,752,312	8,256,936	10,627,067	2,370,131
ALDL	80,542	80,542	80,542	241,627	333,412	91,785
BAVL	9,449	9,449	9,449	28,346	30,096	1,750
BMBR	6,992	6,992	6,992	20,975	38,048	17,073
BRWL	7,288	7,288	7,288	21,865	90,906	69,041
CLTN	192,518	192,518	192,518	577,553	770,553	193,000
DNMK	8,917	8,917	8,917	26,752	44,232	17,480
EDBH	3,320	3,320	3,320	9,961	35,619	25,658
FNIN	30,074	30,074	30,074	90,222	159,821	69,599
HNPH	229,891	229,891	229,891	689,674	839,073	149,399
JONN	64,045	64,045	64,045	192,136	207,980	15,844
ORBG	143,802	143,802	143,802	431,407	655,082	223,675
SPFD	1,748	1,748	1,748	5,243	11,705	6,462
STGR	62,711	62,711	62,711	188,134	56,780	(131,354)
TOTAL 2-WAY	841,298	841,298	841,298	2,523,895	3,273,307	749,412

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELL SOUTH
1999**

	Jan-99	Feb-99
TOTAL FLAT RATE	2,817,767	2,568,792
ALDL	95,193	86,593
BAVL	8,873	6,904
BMBR	12,370	9,711
BRWL	28,756	22,581
CLTN	210,240	191,885
DNMK	10,574	8,314
EDBH	8,473	4,835
FNIN	38,743	37,132
HNPH	229,575	221,584
JONN	45,888	31,010
ORBG	179,145	159,444
SPFD	3,350	2,277
STGR	51	333
TOTAL 2-WAY	871,031	782,603



United Telephone Co. of the Carolinas
6860 W. 115th Street
MS: KSOPKD0116
Overland Park, KS 66211

Invoice No **05990506**

Bill Date **5/28/99**

Issue Date **5/28/99**

Ms. Marilee Calvert
BellSouth Telecommunications
600 N 19th, 3rd Floor Bin 3-5
P O Box 771
Birmingham, Alabama 35203

Remit Payment to:
United Telephone Co. of the Carolinas
Attn: Judy Weinzierl
Intralata Settlements & Billing
6860 West 115th Street
Overland Park, KS 66211
Phone (913) 433-1656

- Description -

Traffic Sensitive Recovery of One Way ACP Usage
Between
United Telephone Co. of the Carolinas
and
BellSouth Telecommunications

(See attached pages for calculation of charges.)

	Due BELLSOUTH	Due UTCC/Sprint
Net Amount Due	\$ 31,972.25	\$ 31,972.25
Adjustments*	\$ -	\$ -
Total Amount Due	\$ 31,972.25	\$ 31,972.25

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELL SOUTH**

ACP USAGE	MARCH 1999
TOTAL FLAT RATE USAGE	2,475,704
LESS TWO WAY USAGE	748,408
ONE WAY USAGE (BELL TO SPRINT)	1,727,296
TS RATE	0.018510
AMOUNT	\$31,972.25

UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA

TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELLSOUTH
1999

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	TOTAL
TOTAL FLAT RATE	2,817,767	2,568,792	2,475,704										7,862,263
ALDL	95,193	86,593	98,902	0	0	0	0	0	0	0	0	0	280,688
BAVL	8,873	6,904	10,023	0	0	0	0	0	0	0	0	0	25,800
BMBR	12,370	9,711	11,461	0	0	0	0	0	0	0	0	0	33,542
BRWL	28,756	22,581	25,237	0	0	0	0	0	0	0	0	0	76,574
CLTN	210,240	191,885	210,558	0	0	0	0	0	0	0	0	0	612,683
DNMK	10,574	8,314	8,206	0	0	0	0	0	0	0	0	0	27,094
EDBH	8,473	4,835	8,877	0	0	0	0	0	0	0	0	0	22,185
FNIN	38,743	37,132	46,295	0	0	0	0	0	0	0	0	0	122,170
HNPB	229,575	221,584	123,759	0	0	0	0	0	0	0	0	0	574,918
JONN	45,688	31,010	38,197	0	0	0	0	0	0	0	0	0	114,895
ORBG	179,145	159,444	161,188	0	0	0	0	0	0	0	0	0	499,777
SPFD	3,360	2,277	1,392	0	0	0	0	0	0	0	0	0	7,015
STGR	51	333	4,313	0	0	0	0	0	0	0	0	0	4,697
TOTAL 2-WAY	871,031	882,603	897,408	0	0	0	0	0	0	0	0	0	2,402,042



United Telephone Co. of the Carolinas
 6860 W. 115th Street
 MS: KSOPKD0116
 Overland Park, KS 66211

Invoice No **06990506**

Bill Date **6/4/99**

Issue Date **6/4/99**

Ms. Marilee Calvert
 BellSouth Telecommunications
 600 N 19th, 3rd Floor Bin 3-5
 P O Box 771
 Birmingham, Alabama 35203

Remit Payment to:
 United Telephone Co. of the Carolinas
 Attn: Judy Weinzierl
 Intralata Settlements & Billing
 6860 West 115th Street
 Overland Park, KS 66211
 Phone (913) 433-1656

- Description -

Traffic Sensitive Recovery of One Way ACP Usage
 Between
 United Telephone Co. of the Carolinas
 and
 BellSouth Telecommunications

(See attached pages for calculation of charges.)

Due BELL SOUTH

Due UTCC/Sprint

Net Amount Due \$ **28,561.19**

\$ **28,561.19**

Adjustments* \$ **0.00**

\$ **0.00**

Total Amount Due \$ **28,561.19**

\$ **28,561.19**

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

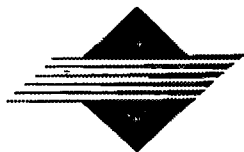
**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELL SOUTH**

ACP USAGE	APRIL 1999
TOTAL FLAT RATE USAGE	2,290,153
LESS TWO WAY USAGE	747,139
ONE WAY USAGE (BELL TO SPRINT)	1,543,014
TS RATE	0.018510
AMOUNT	\$28,561.19

UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA

TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELLSOUTH
1999

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	TOTAL
TOTAL FLAT RATE	2,817,767	2,568,792	2,475,704	2,290,153									10,152,416
ALDL	95,193	86,593	98,902	101,698	0	0	0	0	0	0	0	0	382,386
BAVL	8,873	6,904	10,023	7,746	0	0	0	0	0	0	0	0	33,546
BMBR	12,370	9,711	11,461	12,525	0	0	0	0	0	0	0	0	46,067
BRWL	28,756	22,581	25,237	22,018	0	0	0	0	0	0	0	0	98,592
CLTN	210,240	191,885	210,558	198,676	0	0	0	0	0	0	0	0	811,359
DNMK	10,574	8,314	8,206	10,410	0	0	0	0	0	0	0	0	37,504
EDBH	8,473	4,835	8,877	5,714	0	0	0	0	0	0	0	0	27,899
FNIN	38,743	37,132	46,295	40,806	0	0	0	0	0	0	0	0	162,976
HNPB	229,575	221,584	123,759	110,761	0	0	0	0	0	0	0	0	685,679
JONN	45,688	31,010	38,197	37,078	0	0	0	0	0	0	0	0	151,973
ORBG	179,145	159,444	161,188	163,383	0	0	0	0	0	0	0	0	669,160
SPFD	3,350	2,277	1,392	2,709	0	0	0	0	0	0	0	0	9,728
STGR	51	333	4,313	27,615	0	0	0	0	0	0	0	0	32,312
TOTAL 2-WAY	871,031	782,603	748,408	747,139	0	0	0	0	0	0	0	0	3,149,181



United Telephone Co. of the Carolinas
6860 W. 115th Street
MS: KSOPKD0116
Overland Park, KS 66211

Invoice No **07990506**

Bill Date **7/2/99**

Issue Date **7/2/99**

Ms. Marilee Calvert
BellSouth Telecommunications
600 N 19th, 3rd Floor Bin 3-5
P O Box 771
Birmingham, Alabama 35203

Remit Payment to:
United Telephone Co. of the Carolinas
Attn: Judy Weinzierl
Intralata Settlements & Billing
6860 West 115th Street
Overland Park, KS 66211
Phone (913) 433-1656

- Description -

Traffic Sensitive Recovery of One Way ACP Usage
Between
United Telephone Co. of the Carolinas
and
BellSouth Telecommunications

(See attached pages for calculation of charges.)

	Due BELLSOUTH	Due UTCC/Sprint
Net Amount Due	\$ -	\$ 27,325.83
Adjustments*	\$ -	
Total Amount Due	\$ -	\$ 27,325.83

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELL SOUTH**

ACP USAGE	MAY 1999
TOTAL FLAT RATE USAGE	2,214,956
LESS TWO WAY USAGE	738,682
ONE WAY USAGE (BELL TO SPRINT)	1,476,274
TS RATE	0.018510
AMOUNT	\$27,325.83

UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA

TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELLSOUTH
1999

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	TOTAL
TOTAL FLAT RATE	2,817,767	2,568,792	2,475,704	2,290,153	2,214,956								12,367,372
ALDL	95,193	86,593	98,902	101,698	104,635	0	0	0	0	0	0	0	487,021
BAVL	8,873	6,904	10,023	7,746	7,831	0	0	0	0	0	0	0	41,377
BMBR	12,370	9,711	11,461	12,525	12,298	0	0	0	0	0	0	0	58,365
BRWL	28,756	22,581	25,237	22,018	24,251	0	0	0	0	0	0	0	122,843
CLTN	210,240	191,885	210,558	198,676	199,779	0	0	0	0	0	0	0	1,011,138
DNMK	10,574	8,314	8,206	10,410	9,420	0	0	0	0	0	0	0	46,924
EDBH	8,473	4,835	8,877	5,714	3,987	0	0	0	0	0	0	0	31,886
FNIN	38,743	37,132	46,295	40,806	40,627	0	0	0	0	0	0	0	203,603
HNPH	229,575	221,584	123,759	110,761	104,187	0	0	0	0	0	0	0	789,866
JONN	45,688	31,010	38,197	37,078	41,294	0	0	0	0	0	0	0	193,267
ORBG	179,145	159,444	161,188	169,383	163,770	0	0	0	0	0	0	0	832,931
SPFD	3,350	2,277	1,392	2,709	2,474	0	0	0	0	0	0	0	12,202
STGR	51	383	4,313	27,615	24,129	0	0	0	0	0	0	0	56,441
TOTAL 2-WAY	8,103,171	82,603	48,408	747,139	738,682	0	0	0	0	0	0	0	3,887,863



United Telephone Co. of the Carolinas
6860 W. 115th Street
MS: KSOPKD0116
Overland Park, KS 66211

Invoice No **08990506**

Bill Date **8/2/99**

Issue Date **8/2/99**

Ms. Marilee Calvert
BellSouth Telecommunications
600 N 19th, 3rd Floor Bin 3-5
P O Box 771
Birmingham, Alabama 35203

Remit Payment to:
United Telephone Co. of the Carolinas
Attn: Judy Weinzierl
Intralata Settlements & Billing
6860 West 115th Street
Overland Park, KS 66211
Phone (913) 433-1656

- Description -

**Traffic Sensitive Recovery of One Way ACP Usage
Between
United Telephone Co. of the Carolinas
and
BellSouth Telecommunications**

(See attached pages for calculation of charges.)

	Due BELLSOUTH	Due UTCC/Sprint
Net Amount Due	\$ -	\$ 29,391.68
Adjustments*	\$ -	
Total Amount Due	\$ -	\$ 29,391.68

For Billing Inquiries, call (913) 433-1656

**UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA**

**TRAFFIC SENSITIVE RECOVERY OF
ONE WAY ACP USAGE
FROM BELL SOUTH**

ACP USAGE	JUNE 1999
TOTAL FLAT RATE USAGE	2,342,834
LESS TWO WAY USAGE	754,953
ONE WAY USAGE (BELL TO SPRINT)	1,587,881
TS RATE	0.018510
AMOUNT	\$29,391.68

UNITED TELEPHONE COMPANY
OF THE CAROLINAS (SPRINT)
SOUTH CAROLINA

TRAFFIC SENSITIVE RECOVERY OF
ONE - WAY ACP USAGE
FROM BELLSOUTH
1999

	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	TOTAL
TOTAL FLAT RATE	2,817,767	2,568,792	2,475,704	2,290,153	2,214,956	2,342,834							14,710,206
ALDL	95,193	86,593	98,902	101,698	104,635	97,169	0	0	0	0	0	0	584,190
BAVL	8,873	6,904	10,023	7,746	7,831	8,216	0	0	0	0	0	0	49,595
BMBR	12,370	9,711	11,461	12,525	12,298	11,981	0	0	0	0	0	0	70,346
BRWL	28,756	22,581	25,237	22,018	24,251	23,733	0	0	0	0	0	0	146,576
CLTN	210,240	191,885	210,558	198,676	199,779	210,166	0	0	0	0	0	0	1,221,304
DNMK	10,574	8,314	8,206	10,410	9,420	8,647	0	0	0	0	0	0	55,571
EDBH	8,473	4,835	8,877	5,714	3,987	6,954	0	0	0	0	0	0	40,840
FNIN	38,743	37,132	46,295	40,806	40,627	42,756	0	0	0	0	0	0	246,359
HNPH	229,575	221,584	123,759	110,761	104,187	104,671	0	0	0	0	0	0	894,537
JONN	45,688	31,010	38,197	37,078	41,294	38,379	0	0	0	0	0	0	231,646
ORBG	179,145	159,444	161,188	169,383	163,770	162,849	0	0	0	0	0	0	995,770
SPFD	3,350	2,277	1,392	2,709	2,474	2,454	0	0	0	0	0	0	14,650
STGR	51	333	4,313	27,615	24,129	34,976	0	0	0	0	0	0	91,417
TOTAL 2-WAY	871,031	882,603	948,408	947,139	938,682	954,953	0	0	0	0	0	0	4,642,816